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United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

United States of America,
Plaintiff,

v.

Emile Edward Bouari,
Kimberly Ann Milko,
Mary Diane Green, and
Ghassan Bouari Houbous,
Defendants.

2:16-cr- 32

SEALED CRIMINAL INDICTMENT

VIOLATIONS:

18 U.S.C. §1956(a)(3)—Money Laundering;
18 U.S.C. §1956(h)—Conspiracy to Commit
Money Laundering
18 U.S.C. § 2-Aiding and Abetting

THE GRAND JURY CHARGES THAT:

COUNT ONE
Money Laundering

On or about May 8, 2014, in the State and Federal District of Nevada,

EMILE EDWARD BOUARI,

defendant herein, with the intent to promote the carrying on of specified unlawful activity and the intent to conceal and disguise the nature, location, source, ownership and control of property believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction, in and affecting interstate commerce, in the amount of

1 approximately twenty thousand dollars (\$20,000), involving property represented by a federal
2 law enforcement officer to be proceeds of specified unlawful activity and property used to
3 conduct and facilitate specified unlawful activity, to wit: monies and funds derived from
4 narcotics trafficking, that is, the possession and sale of illegal controlled substances; and from
5 transporting, recruiting and harboring and causing the transportation recruiting and harboring of
6 persons for commercial sex acts, all in violation of Title 18, United States Code, Section
7 1956(a)(3)(A) and (B).

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9 COUNT TWO
Money Laundering

10 On or about May 29, 2014, in the State and Federal District of Nevada,

11 EMILE EDWARD BOUARI,

12 defendant herein, with the intent to promote the carrying on of specified unlawful activity and
13 the intent to conceal and disguise the nature, location, source, ownership and control of property
14 believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to
15 conduct a financial transaction, in and affecting interstate commerce, in the amount of
16 approximately fifty thousand dollars (\$50,000), involving property represented by a federal law
17 enforcement officer to be proceeds of specified unlawful activity and property used to conduct
18 and facilitate specified unlawful activity, to wit: monies and funds derived from narcotics
19 trafficking, that is, the possession and sale of illegal controlled substances; and from
20 transporting, recruiting and harboring and causing the transportation recruiting and harboring of
21 persons for commercial sex acts, all in violation of Title 18, United States Code, Section
22 1956(a)(3)(A) and (B).

COUNT THREE

Money Laundering

On or about September 29, 2014, in the State and Federal District of Nevada,

EMILE EDWARD BOUARI,

defendant herein, with the intent to promote the carrying on of specified unlawful activity and the intent to conceal and disguise the nature, location, source, ownership and control of property believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction, in and affecting interstate commerce, in the amount of approximately one hundred thousand dollars (\$100,000), involving property represented by a federal law enforcement officer to be proceeds of specified unlawful activity and property used to conduct and facilitate specified unlawful activity, to wit: monies and funds derived from narcotics trafficking, that is, the possession and sale of illegal controlled substances; and from transporting, recruiting and harboring and causing the transportation recruiting and harboring of persons for commercial sex acts, all in violation of Title 18, United States Code, Section 1956(a)(3)(A) and (B).

COUNT FOUR

Money Laundering

On or about September 30, 2014, in the State and Federal District of Nevada,

MARY DIANE GREEN, and
EMILE EDWARD BOUARI,

defendant herein, with the intent to promote the carrying on of specified unlawful activity and the intent to conceal and disguise the nature, location, source, ownership and control of property believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction, in and affecting interstate commerce, in the amount of approximately twenty five thousand dollars (\$25,000), involving property represented by a federal law enforcement officer to be proceeds of specified unlawful activity and property used to conduct and facilitate specified unlawful activity, to wit: monies and funds derived from narcotics trafficking, that is, the possession and sale of illegal controlled substances; and from

1 transporting, recruiting and harboring and causing the transportation recruiting and harboring of
2 persons for commercial sex acts, all in violation of Title 18, United States Code, Section
3 1956(a)(3)(A) and (B), and Title 18, United States Code, Section 2.

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5 COUNT FIVE
Money Laundering

6 On or about September 30, 2014, in the State and Federal District of Nevada,

7 KIMBERLY ANN MILKO, and
8 EMILE EDWARD BOUARI,

9 defendant herein, with the intent to promote the carrying on of specified unlawful activity, and
10 the intent to conceal and disguise the nature, location, source, ownership and control of property
11 believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to
12 conduct a financial transaction, in and affecting interstate commerce, in the amount of
13 approximately twenty five thousand dollars (\$25,000), involving property represented by a
14 federal law enforcement officer to be proceeds of specified unlawful activity and property used
15 to conduct and facilitate specified unlawful activity, to wit: monies and funds derived from
16 narcotics trafficking, that is, the possession and sale of illegal controlled substances; and from
17 transporting, recruiting and harboring and causing the transportation recruiting and harboring of
18 persons for commercial sex acts, all in violation of Title 18, United States Code, Section
19 1956(a)(3)(A) and (B), and Title 18, United States Code, Section 2.

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21 COUNT SIX
Money Laundering

22 On or about October 27, 2014, in the State and Federal District of Nevada,

23 EMILE EDWARD BOUARI,

24 defendant herein, with the intent to promote the carrying on of specified unlawful activity and
25 the intent to conceal and disguise the nature, location, source, ownership and control of property
26 believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to
27 conduct a financial transaction, in and affecting interstate commerce, in the amount of
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1 approximately one hundred thousand dollars (\$100,000), involving property represented by a
2 federal law enforcement officer to be proceeds of specified unlawful activity and property used
3 to conduct and facilitate specified unlawful activity, to wit: monies and funds derived from
4 narcotics trafficking, that is, the possession and sale of illegal controlled substances; and from
5 transporting, recruiting and harboring and causing the transportation recruiting and harboring of
6 persons for commercial sex acts, all in violation of Title 18, United States Code, Section
7 1956(a)(3)(A) and (B).

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9 COUNT SEVEN
Money Laundering

10 On or about October 28, 2014, in the State and Federal District of Nevada,

11
12 KIMBERLY ANN MILKO, and
EMILE EDWARD BOUARI,

13 defendant herein, with the intent to promote the carrying on of specified unlawful activity and
14 the intent to conceal and disguise the nature, location, source, ownership and control of property
15 believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to
16 conduct a financial transaction, in and affecting interstate commerce, in the amount of
17 approximately twenty five thousand dollars (\$25,000), involving property represented by a
18 federal law enforcement officer to be proceeds of specified unlawful activity and property used
19 to conduct and facilitate specified unlawful activity, to wit: monies and funds derived from
20 narcotics trafficking, that is, the possession and sale of illegal controlled substances; and from
21 transporting, recruiting and harboring and causing the transportation recruiting and harboring of
22 persons for commercial sex acts, all in violation of Title 18, United States Code, Section
23 1956(a)(3)(A) and (B), and Title 18 United States Code, Section 2.
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COUNT EIGHT
Money Laundering

On or about December 1, 2014, in the State and Federal District of Nevada,

KIMBERLY ANN MILKO, and
EMILE EDWARD BOUARI,

defendant herein, with the intent to promote the carrying on of specified unlawful activity and the intent to conceal and disguise the nature, location, source, ownership and control of property believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction, in and affecting interstate commerce, in the amount of approximately thirty thousand dollars (\$30,000), involving property represented by a federal law enforcement officer to be proceeds of specified unlawful activity and property used to conduct and facilitate specified unlawful activity, to wit: monies and funds derived from narcotics trafficking, that is, the possession and sale of illegal controlled substances; and from transporting, recruiting and harboring and causing the transportation recruiting and harboring of persons for commercial sex acts, all in violation of Title 18, United States Code, Section 1956(a)(3)(A) and (B), and Title 18, United States Code, Section 2.

COUNT NINE
Money Laundering

On or about December 1, 2014, in the State and Federal District of Nevada,

EMILE EDWARD BOUARI,

defendant herein, with the intent to promote the carrying on of specified unlawful activity and the intent to conceal and disguise the nature, location, source, ownership and control of property believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction, in and affecting interstate commerce, in the amount of approximately seventy five thousand dollars (\$75,000), involving property represented by a

1 federal law enforcement officer to be proceeds of specified unlawful activity and property used
2 to conduct and facilitate specified unlawful activity, to wit: monies and funds derived from
3 narcotics trafficking, that is, the possession and sale of illegal controlled substances; and from
4 transporting, recruiting and harboring and causing the transportation recruiting and harboring of
5 persons for commercial sex acts, all in violation of Title 18, United States Code, Section
6 1956(a)(3)(A) and (B).

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8 COUNT TEN
Money Laundering

9 On or about February 3, 2015, in the State and Federal District of Nevada,

10 KIMBERLY ANN MILKO, and
11 EMILE EDWARD BOUARI,

12 defendant herein, with the intent to promote the carrying on of specified unlawful activity and
13 the intent to conceal and disguise the nature, location, source, ownership and control of property
14 believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to
15 conduct a financial transaction, in and affecting interstate commerce, in the amount of
16 approximately thirty thousand dollars (\$30,000), involving property represented by a federal law
17 enforcement officer to be proceeds of specified unlawful activity and property used to conduct
18 and facilitate specified unlawful activity, to wit: monies and funds derived from narcotics
19 trafficking, that is, the possession and sale of illegal controlled substances; and from
20 transporting, recruiting and harboring and causing the transportation recruiting and harboring of
21 persons for commercial sex acts, all in violation of Title 18, United States Code, Section
22 1956(a)(3)(A) and (B), and Title 18, United States Code, Section 2.

23 COUNT ELEVEN
24 Money Laundering

25 On or about April 27, 2015, in the State and Federal District of Nevada,

26 EMILE EDWARD BOUARI,
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defendant herein, with the intent to promote the carrying on of specified unlawful activity and the intent to conceal and disguise the nature, location, source, ownership and control of property believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction, in and affecting interstate commerce, in the amount of approximately ~~thirty~~ fifty thousand dollars (\$50,000), involving property represented by a federal law enforcement officer to be proceeds of specified unlawful activity and property used to conduct and facilitate specified unlawful activity, to wit: monies and funds derived from narcotics trafficking, that is, the possession and sale of illegal controlled substances; and from transporting, recruiting and harboring and causing the transportation recruiting and harboring of persons for commercial sex acts, all in violation of Title 18, United States Code, Section 1956(a)(3)(A) and (B).

COUNT TWELVE
Money Laundering

On or about August 20, 2015, in the State and Federal District of Nevada, and elsewhere,

EMILE EDWARD BOUARI, and
GHASSAN BOUARI HOUSBOUS,

defendants herein, aiding and abetting one another and others, with the intent to promote the carrying on of specified unlawful activity and the intent to conceal and disguise the nature, location, source, ownership and control of property believed to be the proceeds of specified unlawful activity, did knowingly conduct and attempt to conduct a financial transaction, in and affecting interstate commerce, in the amount of approximately sixty thousand dollars (\$60,000), involving property represented by a federal law enforcement officer to be proceeds of specified unlawful activity and property used to conduct and facilitate specified unlawful activity, to wit: monies and funds derived from narcotics trafficking, that is, the possession and sale of illegal controlled substances; and from transporting, recruiting and harboring and causing the transportation recruiting and harboring of persons for commercial sex acts, all in violation of

1 Title 18, United States Code, Section 1956(a)(3)(A) and (B), and Title 18 United States Code,
2 Section 2.

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4 COUNT THIRTEEN
Conspiracy to Commit Money Laundering

5 From a date unknown but not earlier than in or around March 2014, to on or about the
6 present date, in the State and Federal District of Nevada, Florida, and elsewhere,

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8 EMILE EDWARD BOUARI,
KIMBERLY ANN MILKO,
9 MARY DIANE GREEN, and
GHASSAN BOUARI HOUSBOUS,

10 defendants herein, did knowingly combine, conspire, confederate, and agree with each other and
11 with other persons known and unknown to the Grand Jury to commit offenses against the United
12 States in violation of Title 18, United States Code, Section 1956, to wit: with the intent to
13 promote the carrying on of specified unlawful activity, and the intent to conceal and disguise the
14 nature, location, source, ownership and control of property believed to be the proceeds of
15 specified unlawful activity, did knowingly conduct and attempt to conduct financial
16 transactions, in and affecting interstate commerce, involving property represented by a federal
17 law enforcement officers to be proceeds of specified unlawful activities and property used to
18 conduct and facilitate specified unlawful activities, to wit: monies and funds derived from
19 narcotics trafficking, that is, the possession and sale of illegal controlled substances; and from
20 transporting, recruiting and harboring and causing the transportation, recruiting, and harboring of
21 persons for commercial sex acts, in violation of Title 18, United States Code, Section
22 1956(a)(3)(A) and (B).

23 Objectives and Manner and Means

24 The objectives of the conspiracy were for the defendants to launder money as described
25 in Counts One through Twelve of this Indictment.

26 The manner and means the defendants used to accomplish the objectives of the
27 conspiracy included, among others, the defendants agreeing to launder bulk cash monies

1 represented by federal law enforcement officers to be and the defendants believed to be proceeds
2 derived from the illegal criminal activities described above and the defendants agreeing to
3 receive and helping co-conspirators receive a percentage of the money they laundered as
4 compensation for laundering the money.

5 In furtherance of the conspiracy, the defendants laundered approximately \$590,000
6 believed by the defendants to be illegal criminal proceeds. In exchange for receiving the bulk
7 cash from federal law enforcement officers, the defendants gave to federal law enforcement
8 officers checks drawn against business bank accounts owned and otherwise controlled by the
9 defendants, which checks were made payable to fictitious shell companies controlled by federal
10 law enforcement and which totaled the amount of cash received less the amount of money the
11 defendants kept as compensation for laundering the money, that is, approximately fifty two
12 thousand nine hundred dollars (\$52,900).

13 All in violation of Title 18, United States Code, Section 1956(h).

14 FORFEITURE ALLEGATION ONE

15 Money Laundering and Conspiracy to Commit Money Laundering

16 1. The allegations contained in Counts One through Thirteen of this Criminal Indictment
17 are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture
18 pursuant to Title 18, United States Code, Section 981(a)(1)(A) with Title 28, United States Code,
19 Section 2461(c).

20 2. Upon conviction of any of the felony offenses charged in Counts One through
21 Thirteen of this Criminal Indictment,

22 EMILE EDWARD BOUARI,
23 KIMBERLY ANN MILKO,
24 MARY DIANE GREEN, and
GHASSAN BOUARI HOUBOUS,

25 defendants herein, shall forfeit to the United States of America, any property, real or personal,
26 involved in transactions or attempted transactions in violation of Title 18, United States Code,
27 Section 1956(a)(3)(A) and (B) and Title 18, United States Code, Section 1956(h), or any

1 property traceable to such property, an in personam criminal forfeiture money judgment
2 including, but not limited to, at least \$590,000 (property).

3 3. If any property subject to forfeiture pursuant to Title 18, United States Code, Section
4 981(a)(1)(A) with Title 28, United States Code, Section 2461(c), as a result of any act or
5 omission of the defendants-

- 6 a. cannot be located upon the exercise of due diligence;
- 7 b. has been transferred or sold to, or deposited with, a third party;
- 8 c. has been placed beyond the jurisdiction of the court;
- 9 d. has been substantially diminished in value; or
- 10 e. has been commingled with other property which cannot be divided without
11 difficulty;

12 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section
13 853(p), to seek forfeiture of any properties of the defendants for the in personam criminal
14 forfeiture money judgment including, but not limited to, at least \$590,000.

15 All pursuant to Title 18, United States Code, Section 981(a)(1)(A) with Title 28, United
16 States Code, Section 2461(c); Title 18, United States Code, Section 1956(a)(3)(A) and (B); Title
17 18, United States Code, Section 1956(h); and Title 21, United States Code, Section 853(p).

18 FORFEITURE ALLEGATION TWO

19 Money Laundering and Conspiracy to Commit Money Laundering

20 1. The allegations contained in Counts One through Thirteen of this Criminal Indictment
21 are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture
22 pursuant to Title 18, United States Code, Section 981(a)(1)(C) with Title 28, United States Code,
23 Section 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts One through Thirteen of this Criminal Indictment,

EMILE EDWARD BOUARI,
KIMBERLY ANN MILKO,
MARY DIANE GREEN, and
GHASSAN BOUARI HOUBOUS,

defendants herein, shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1956(a)(3)(A) and (B), specified unlawful activities as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1)(B), or Title 18, United States Code, Section 1956(h), conspiracy to commit such offenses, an in personam criminal forfeiture money judgment including, but not limited to, at least \$590,000 (property).

3. If any property being subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) with Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendants -

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendants for the in personam criminal forfeiture money judgment including, but not limited to, at least \$590,000.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) with Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 1956(a)(3)(A) and (B); Title 18, United States Code, Section 1956(h); and Title 21, United States Code, Section 853(p).

FORFEITURE ALLEGATION THREE

Money Laundering or Unlicensed Money Transmitting Business Conspiracy

1. The allegations contained in Counts One through Thirteen of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1).

2. Upon conviction of any of the felony offenses charged in Counts One through Thirteen of this Criminal Indictment,

EMILE EDWARD BOUARI,
KIMBERLY ANN MILKO,
MARY DIANE GREEN, and
GHASSAN BOUARI HOUBOUS ,

defendants herein, shall forfeit to the United States of America, any property, real or personal, involved in violations of Title 18, United States Code, Section 1956(a)(3)(A) and (B) and Title 18, United States Code, Section 1956(h), or any property traceable to such property, an in personam criminal forfeiture money judgment including, but not limited to, at least \$590,000 (property).

3. If any property subject to forfeiture pursuant to Title 18, United States Code, Section 982(a)(1), as a result of any act or omission of the defendants-

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any properties of the defendants for the in personam criminal forfeiture money judgment including, but not limited to, at least \$590,000.

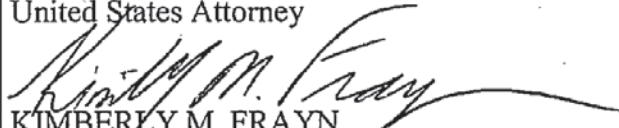
1 All pursuant to Title 18, United States Code, Section 982(a)(1); Title 18, United States
2 Code, Section 1956(a)(3)(A) and (B); Title 18, United States Code, Section 1956(h); and Title
3 21, United States Code, Section 853(p).

4
5 **DATED:** this 3rd day of February, 2016

6 **A TRUE BILL:**

7 /s/
8 FOREPERSON OF THE GRAND JURY

9 DANIEL G. BOGDEN
10 United States Attorney

11 
12 KIMBERLY M. FRAYN
13 LISA CARTIER-GIROUX
Assistant United States Attorneys